

CLARK HILL PLC  
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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
DELPHI CORPORATION, <i>et al.</i> ,	)	Case No. 05-44481 (RDD)
Debtors.	)	(Jointly Administered)

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**AFFIDAVIT OF JOEL D. APPLEBAUM IN SUPPORT OF TIMELINESS OF  
RESPONSE OF MANUFACTURERS EQUIPMENT & SUPPLY CO. IN OPPOSITION  
TO DEBTORS' FIFTEENTH OMNIBUS OBJECTION (SUBSTANTIVE) PURSUANT  
TO 11 U.S.C. §502(b) AND FED. R. BANKR. P. 3007 TO CERTAIN (A)  
INSUFFICIENTLY DOCUMENTED CLAIMS, (B) CLAIMS NOT REFLECTED ON  
DEBTORS' BOOKS AND RECORDS, (C) UNTIMELY CLAIMS AND UNTIMELY TAX  
CLAIM, AND (D) CLAIMS SUBJECT TO MODIFICATION, TAX CLAIMS SUBJECT  
TO MODIFICATION, AND MODIFIED CLAIMS ASSERTING RECLAMATION**

STATE OF MICHIGAN )  
                       ) SS  
COUNTY OF WAYNE )

Joel D. Applebaum of Clark Hill PLC ("Affiant"), being first duly sworn, deposes and states as follows:

1. Affiant is an attorney and a member of Clark Hill PLC ("Clark Hill") and is authorized to make this Affidavit on behalf of Clark Hill in Support of the Response of Manufacturers Equipment & Supply Co. in Opposition to Debtors' Fifteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. §502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected on Debtors' Books and Records,

(C) Untimely Claims and Untimely Tax Claim, and (D) Claims Subject to Modification, Tax Claims Subject to Modification, and Modified Claims Asserting Reclamation (the "Response").

2. I make this Affidavit from my personal knowledge and am competent to testify about the matters stated herein.

3. On June 19, 2007, my assistant logged into the ECF/Case Management System on my behalf in order to file the Response using my ECF identification and password prior to the 4:00 p.m. deadline.

4. While attempting to link the Response to the Debtors' Fifteenth Omnibus Objection (Substantive) Pursuant to 11 U.S.C. §502(b) and Fed. R. Bankr. P. 3007 to Certain (A) Insufficiently Documented Claims, (B) Claims Not Reflected on Debtors' Books and Records, (C) Untimely Claims and Untimely Tax Claim, and (D) Claims Subject to Modification, Tax Claims Subject to Modification, and Modified Claims Asserting Reclamation (the "Claim Objection"), as required for filing, the ECF System terminated the filing session and ejected us from the ECF System prior to the filing being completed.

5. As a result of the technical problems associated with the ECF System with respect to filing the Response, we were required to re-start the filing process from the beginning, and we were unable to complete the filing until 4:10 p.m.

CLARK HILL PLC

By: /s/ Joel D. Applebaum

Joel D. Applebaum (P48627)

Its: Member and duly authorized agent

Subscribed and sworn to before me  
on June 21, 2007

Theresa D. Keeffe, Notary Public  
Macomb County, Michigan

My commission expires: 9-4-2011

THERESA D. KEEFE  
Notary Public, State of MI  
County of Macomb  
My Commission Expires 09-04-2011  
Acting in the County of